

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,	)	
	)	
	)	
Plaintiff,	)	C.A. No. 16-122-LPS
	)	
v.	)	<b>JURY TRIAL DEMANDED</b>
	)	
GROUPON, INC.	)	
	)	
Defendant.	)	

**IBM’S NOTICE OF 30(B)(1) DEPOSITION OF MICHAEL MULVIHILL**

Please take notice that, pursuant to Federal Rules of Civil Procedure 30(b)(1), Plaintiff International Business Machines Corporation (“IBM”), by its counsel, will take the deposition upon oral examination of Michael Mulvihill. The deposition will begin on August 2, 2017, at 9:30 a.m., at the offices of Desmarais LLP, 230 Park Avenue, New York, NY 10169, or at such time and place as the parties may agree.

The deposition will be before a Notary Public or other officer authorized by law to administer oaths and will be recorded using videographic, audiographic, and/or stenographic means, or a combination of those means.

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

John M. Desmarais  
Karim Oussayef  
Laurie N. Stempler  
Robert C. Harrits  
Brian D. Matty  
Michael Matulewicz-Crowley  
DESMARAIS LLP  
230 Park Avenue  
New York, NY 10169  
Tel: (212) 351-3400

By: /s/ Bindu A. Palapura  
David E. Moore (#3983)  
Bindu A. Palapura (#5370)  
Stephanie E. O’Byrne (#4446)  
Hercules Plaza, 6<sup>th</sup> Floor  
1313 N. Market Street  
Wilmington, DE 19801  
Tel: (302) 984-6000  
[dmoore@potteranderson.com](mailto:dmoore@potteranderson.com)  
[bpalapura@potteranderson.com](mailto:bpalapura@potteranderson.com)  
[sobyrne@potteranderson.com](mailto:sobyrne@potteranderson.com)

Dated: July 13, 2017  
5307705 / 43155

*Attorneys for Plaintiff International Business  
Machines Corporation*